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COLIN CHEMICAL GROUP

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U.S. EPA REGION 6

LOSS OF INTERIM STATUS INSPECTION

REPORT-CHECKLIST

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No. : 589
EPA Region : VI
Site No. : ARD 006 354 542
Date Prepared : September 24, 1986
Contract No. : 68-01-7037
PRC No. : 15-5895-38
Prepared By : PRC Engineering
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INSPECTION CHECKLIST

LOIS INSPECTIONS - REGION VI

Facility Name: Olin Chemicals Group, North Little Rock Works

EPA I.D. No: ARD 006 354 542

Inspection Dates: August 6, 1986

Inspector(s): Eric S. Morton

Jean R. Desruisseaux

Facility Representative(s): A. M. Watkins

G. Blaine Butand

Enforcement Officer: _____

<u>Completed</u>	<u>Item</u>	<u>Section</u>
<u>X</u>	General Information	A
<u>X</u>	Executive Summary	B
<u>X</u>	Summary Report	C
<u>X</u>	List of Documents	D
_____	Hazardous Waste Land Disposal Unit Description	E
_____	SWMU Description	F
_____	Organization Chart	
_____	Facility Drawing(s)	

GENERAL INFORMATION

Facility EPA I.D. Number: ARD 006 354 542

Facility State I.D. Number (Describe): --

Facility Name: Olin Chemicals Group North Little Rock Works

Facility Primary Contact (Name and Title): A. M. Watkins, Plant Manager

501/378-3692

Facility Mailing Address:

(Street) P.O. Box 398

(City) North Little Rock

(State) Arkansas

(Zip) 72115

Facility Location:

(Street) 2200 East 5th Street

(City) North Little Rock

(State) Arkansas

(County) Pulaski

(Zip) 72115

Other Facility Contacts:

Name: G. Blaine Butand Title: Senior Environmental Specialist

Telephone: 615/336-4576 Responsibility: Environmental Affairs

Name: _____ Title: _____

Telephone: _____ Responsibility: _____

Name: _____ Title: _____

Telephone: _____ Responsibility: _____

Name: _____ Title: _____

Telephone: _____ Responsibility: _____

EXECUTIVE SUMMARY

On August 4, 1986, PRC inspectors, Eric S. Morton and Jean R. Desruisseaux, contacted Mr. A. M. Watkins, Olin Corporation, to arrange a RCRA LOIS inspection of the Olin Corporation North Little Rock plant. Mr. Watkins, the plant manager of this facility, said that the plant had been demolished and its hazardous waste units closed under state supervision. He also said that all facility records had been sent to the Olin Corporation regional office in Charleston, TN and suggested that we contact Mr. G. Blaine Butand, Environmental Specialist at this office concerning any records that we required. Eric Morton informed Mr. Watkins that we would contact Mr. Butand when we returned to the office but that we would like to visit the North Little Rock plant to verify its closure status. Mr. Watkins had no problem with this but did say that no one would be available at the plant to answer any questions.

On August 6, 1986, PRC inspectors visited the facility unescorted to confirm that the facility had been closed and to conduct a brief inspection of current conditions. The majority of the facility site was surrounded by a barbed wire topped fence so that the inspectors could only view the site from outside the fence. Only two buildings remained within the fenced-in area. No signs of any processing units or the waste treatment pond were visible. The small office building on-site was deserted and is used to store supplies for Olin Corporation's North Little Rock sales operation (Blaine Butand, personal communication).

PRC contacted Mr. G. Blaine Butand of Olin Corporation to discuss the closure activities at the Olin facility. PRC determined that since the entire facility was closed, rather than completing the entire checklist, the phone interview would focus on the closure of the North Little Rock plant's hazardous waste units. Mr. Butand was advised that PRC had a copy of the North Little Rock plant's closure plan but required a letter of approval for this plan as well as closure certification. Mr. Butand sent this information and some additional correspondence. PRC received this information on August 15, 1986. The discussion below, which will consist primarily of a documentation of closure activities, is based on this information as well as information collected from EPA Region VI files.

The Olin Corporation North Little Rock facility manufactured sulfuric acid by contact process from January 1, 1974 to December 24, 1981 (Document 2). During this

time, the facility operated a single hazardous waste land disposal unit - a wastewater treatment pond. This unit was used for settling/equalization of process wastewater and stormwater runoff from a sulfuric acid plant (Document 5). Olin's Part A application (Document 2) describes the waste handled by this unit as D002. The pond discharged to a neutralization facility from which water was discharged offsite under an NPDES permit. A second unit - the drum storage area - was used to store drummed waste prior to off-site disposal. According to Olin's closure plan,, this area was never used to store hazardous waste (Document 5).

The North Little Rock plant ceased operations on December 24, 1981 (Blaine Butand, personal communications). Existing sulfuric acid stock at the plant was sold by March 1982. On April 22, 1982, Olin Chemical Group submitted a closure plan to the Arkansas Department of Pollution Control and Ecology (ADPCE) for its hazardous waste facilities (Document 5). At the time, both the wastewater treatment pond and the drum storage area had interim status. Later it was determined that the drum storage area never qualified for interim status because it never handled hazardous waste (Document 10). The closure of these facilities was required because Olin planned to demolish its North Little Rock manufacturing facilities.

Demolition of some of the manufacturing operations began in June of 1982 (Blaine Butand, personal communication). ADPCE approved Olin's closure plan on September 9, 1982 (Document 6). According to Mr. Blaine Butand, closure operations took place in October and November of 1982. Demolition activities were completed in December 1982 (Blaine Butand, personal communication). Mr. A. M. Watkins, plant manager, certified closure of the wastewater treatment pond on January 11, 1983 (Document 8) while William B. Denton, P.E., certified closure on January 14, 1983 (Document 7). In a letter dated April 12, 1983, ADPCE officially acknowledge closure of the wastewater treatment pond effective January 14, 1983 (Document 9). On July 24, 1984, Olin Corporation formally withdrew its Part A RCRA Permit Application (Document 11).

The inspection checklist is only partially completed and reflects only those documents retrieved from U.S. EPA Region 6 files and the additional closure information sent to PRC by Blaine Butand of Olin Corporation. Because the North Little Rock Works hazardous waste facility is closed and the entire plant demolished, and because the plant's records had been moved to Olin regional headquarters in Charleston, TN, PRC determined that completion of the checklist would not be practical. Instead, PRC focused

the report on the closure of the plant's hazardous waste land disposal unit - the wastewater treatment pond.

SUMMARY REPORTFacility Name: Olin Corporation

HAZARDOUS WASTE NOTIFICATION STATUS

DOCUMENT

Original Submitted ☐ No ☒ Yes Date 8/15/80 1Amendment(s) ☐ No ☐ Yes Date(s) _____
_____Describe Amendments: _____

PART A APPLICATION STATUS

Original Submitted ☐ No ☒ Yes Date 11/18/80 (Fed) 2
11/17/80 (State) 3Changes ☐ No ☐ Yes Date(s) _____
_____Approved Changes ☐ No ☐ Yes Date(s) _____
_____During Interim Status ☐ Undetermined _____
_____Describe Changes: _____

LOIS CERTIFICATION

Submitted ☐ No ☐ Yes Date _____Certified Groundwater ☐ No ☐ YesCertified Financial ☐ No ☐ Yes ☐ Partial

LOIS VERIFICATION

Groundwater Monitoring System:

Waiver Approved ☐ No ☐ Yes Date _____

Last CME Conducted ☐ None ☐ Yes Date/ Agency _____

Enforcement Action ☐ No ☐ Yes Date _____

Outstanding as of November 8, 1985 ☐ Unknown Issued _____

GWM System Adequate ☐ No ☐ Yes Judged by _____

☐ Unknown _____

Inadequacies: _____

Financial

C/PC Assurance ☐ No ☐ Yes

Mechanism: _____ Amount Closure: _____

Effective Period: _____ Postclosure: _____

Sudden Liability ☐ No ☒ Yes ☐ Variance Document 4

Non-Sudden Liability ☐ No ☒ Yes ☐ Variance Document 4

Financial Adequate ☐ No ☐ Yes Judged by _____

Comments: Document 4 is a cover letter dated 7/12/82 for a certificate of liability insurance which demonstrated financial responsibility for sudden and accidental occurrences. No information was available as to whether more recent financial documentation had been submitted. Since the North Little Rock plant was certified closed on January 11, 1983, it is unlikely such information was submitted.

Part B Application

Date of Call In _____

Date of Submittal _____

NOD Sent ☐ No ☐ Yes Date(s) _____

Complete ☐ No ☐ Yes Date _____

Deficiencies as of November 8, 1985: _____

CLOSURE PLAN

1. Name of Unit: Wastewater Treatment Pond

Unit _ of _ of Section E

Submitted for Approval	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	Date	<u>4/22/82</u>
Approved	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	Date	<u>9/9/82</u>
Implementing on Schedule?	<input type="checkbox"/> No	<input type="checkbox"/> Yes		
Certified Closed by P.E.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	Date	<u>1/14/83</u>

2. Name of Unit:

Unit _ of _ of Section E

Submitted for Approval	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____
Approved	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____
Implementing on Schedule?	<input type="checkbox"/> No	<input type="checkbox"/> Yes		
Certified Closed by P.E.	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____

3. Name of Unit:

Unit _ of _ of Section E

Submitted for Approval	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____
Approved	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____
Implementing on Schedule?	<input type="checkbox"/> No	<input type="checkbox"/> Yes		
Certified Closed by P.E.	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____

4. Name of Unit:

Unit _ of _ of Section E

Submitted for Approval	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____
Approved	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____
Implementing on Schedule?	<input type="checkbox"/> No	<input type="checkbox"/> Yes		
Certified Closed by P.E.	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	_____

CLOSURE PLAN (Continued)

5. Name of Unit:

Unit of of Section ESubmitted for Approval ☐ No ☐ Yes Date Approved ☐ No ☐ Yes Date Implementing on Schedule? ☐ No ☐ YesCertified Closed by P.E. ☐ No ☐ Yes Date

6. Name of Unit:

Unit of of Section ESubmitted for Approval ☐ No ☐ Yes Date Approved ☐ No ☐ Yes Date Implementing on Schedule? ☐ No ☐ YesCertified Closed by P.E. ☐ No ☐ Yes Date

RCRA ACTIVITIES AS OF NOVEMBER 8, 1985

Generator ☒ No ☐ Yes Accumulation time <90 days
 Container Tank

Transporter ☒ No ☐ Yes

Storage in tanks ☒ No ☐ Yes

Storage in containers ☒ No ☐ Yes

Treatment Other Than Land Disposal ☒ No

Codes: ☐ T01 ☐ T03 ☐ T04

Comments: The Olin Chemical Group North Little Rock Works ceased operations
on December 24, 1981. The facility was completely demolished by December of
1982 and its single hazardous waste land disposal unit - the wastewater treatment
pond was acknowledged closed by ADPCE effective January 14, 1983. Therefore,
the facility had no RCRA activities as of November 8, 1985.

RCRA ACTIVITIES AS OF NOVEMBER 8, 1985
(Continued)Land Disposal ☒ NoCodes: ☐ D80 ☐ D81 ☐ D83 ☐ T02
☐ S03 ☐ S04 ☐ T03 ☐ T04Comments: _____

_____UIC (D79) ☒ No ☐ YesExemptions ☒ No ☐ YesElementary
Neutralization Unit ☒ No ☐ Yes Units: _____Recycle ☒ No ☐ Yes Units: _____Small Quantity
Generator ☒ No ☐ Yes Units: _____Other Exemption ☒ No ☐ Yes Units: _____Comments: _____

LIST OF DOCUMENTS

1. Title Notification of Hazardous Waste Activity
Author A. M. Watkins, Plant Manager, Olin Corporation
Date 8/15/80 Number of Pages 1
Reviewed Copied X
Subject Relevance Original description of hazardous wastes and hazardous waste activities at the facility.
2. Title Part A Hazardous Waste Permit Application (Forms 1 and 3)
Author W. A. Oppold, Vice President, Olin Corporation
Date 11/18/80 Number of Pages 5
Reviewed Copied X
Subject Relevance Original description of the facility's hazardous waste units and the wastes they handled.
3. Title Hazardous Waste Permit Application
Author W. A. Oppold, Vice President, Olin Corporation
Date 11/17/80 Number of Pages 4
Reviewed Copied X
Subject Relevance Partial copy of the Part A application submitted by Olin Chemical Group to the State of Arkansas pursuant to regulations adopted under Act 406 of 1979, Arkansas Hazardous Waste Management Act.
4. Title Letter to U.S. EPA Region VI - Re: Certificate of Liability Insurance
Author C. J. Sloan, Olin Corporation
Date 7/12/82 Number of Pages 1
Reviewed Copied X
Subject Relevance Cover letter for Olin Corporation's Certificate of Liability Insurance to demonstrate financial responsibility for sudden and accidental occurrences.

LIST OF DOCUMENTS (Continued)

5. Title Facility Closure Plan - North Little Rock Plant
Author A. M. Watkins, Plant Manager, Olin Chemical Group North Little Rock Works
Date 4/22/82 Number of Pages 25
Reviewed Copied X
Subject Relevance Closure plan submitted for the wastewater treatment pond
and the drum storage area.
6. Title Letter to David Booth, Olin Chemical Group, Re: Facility Closure Plan
Author Robert R. Dorsey, ADPCE
Date 9/9/82 Number of Pages 1
Reviewed Copied X
Subject Relevance Formal approval of Olin's closure plan for the wastewater
treatment pond.
7. Title Letter to John Ward, ADPCE, Re: Closure of the wastewater treatment pond
Author William B. Denton, P.E.
Date 1/14/83 Number of Pages 1
Reviewed Copied X
Subject Relevance Certification of the closure of the wastewater treatment
pond.
8. Title Letter to John Ward, ADPCE
Author A. M. Watkins, Plant Manager, Olin Chemical Group North Little Rock Works
Date 1/11/83 Number of Pages 5
Reviewed Copied X
Subject Relevance Certification of the closure of the wastewater treatment
pond.

LIST OF DOCUMENTS (Continued)

9. Title Letter to David R. Booth, Olin Chemicals Group, Re: Closure of the
wastewater treatment pond.
- Author Richard H. Quinn, ADPCE
- Date 4/12/83 Number of Pages 1
- Reviewed _____ Copied X
- Subject Relevance Official acknowledgement by the ADPCE that the wastewater
treatment pond is considered closed effective January 14, 1983.
10. Title Letter to David R. Booth, Olin Chemical Group
- Author John D. Ward, ADPCE
- Date 7/11/84 Number of Pages 1
- Reviewed _____ Copied X
- Subject Relevance Determination by the ADPCE that the drum storage area
never qualified for interim status because it never
handled hazardous waste.
11. Title Letter to Richard Quinn, ADPCE
- Author David R. Booth, Olin Chemical Group
- Date 7/24/84 Number of Pages 1
- Reviewed _____ Copied X
- Subject Relevance Formal withdrawal by Olin Corporation of its Part A
Application.
12. Title _____
- Author _____
- Date _____ Number of Pages _____
- Reviewed _____ Copied _____
- Subject Relevance _____

USE SEPARATE SHEET FOR EACH UNIT

HAZARDOUS WASTE LAND DISPOSAL UNIT DESCRIPTION

Unit No. _____ of _____

1. Facilities Name of Unit: _____
2. Purpose/Mode of Operation: _____

3. Process Code: _____
4. Design Capacity: _____
(Cite Verification) _____
Volume _____
Rate _____
Depth of unit _____
Depth to ground water _____
5. Date of Existence: _____
(Cite Verification) _____

6. Dates of Last Hazardous and/or Nonhazardous Waste Addition: _____
(Cite Verification) _____

7. Closure Plan Submittal Date: _____
8. Hazardous Waste Code(s) Handled: _____
(Cite Verification) Describe: _____

EPA I.D. Number ARD 006 354 542

Unit No. _____ of _____

9. Non-hazardous Waste Handled: _____

10. Provide Narrative of History of Operation Since 11-19-80; Cite References:

11. Field Observations: _____

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. ____ of ____

1. Name of Unit: _____

2. Purpose/Associated Processes: _____

3. Type/Amount of Waste Received: _____

4. Field Observation: _____
